

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(WESTERN DIVISION)

C.A. No.: 11-30123-KAR

**MICHAEL ZOUFALY, Individually and on
Behalf of All Other Persons Similarly Situated,
Plaintiff,**

v.

**WORLDWIDE TECHSERVICES, LLC,
WORLDWIDE TECHNOLOGY SERVICES,
LLC, and QUALXSERV, LLC,
Defendant**

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
COLLECTIVE ACTION SETTLEMENT**

Pursuant to 29 U.S.C. § 216(b), Plaintiffs hereby move the Court for an order preliminarily approving the settlement of this collective action, as reflected in the Stipulation and Settlement Agreement (the "Agreement") – a true and correct copy of which is filed herewith.

Specifically, Plaintiffs seek an order, substantially in the form of **Exhibit B** to the Agreement, that (a) grants preliminary approval of the Settlement on the terms set forth in the Agreement, (b) appoints Zoufaly as representative of the FLSA Class, (c) confirms the law firm of Connor, Morneau & Olin, LLP as Collective Action Counsel, (d) approves the Settlement Notice attached to the Agreement as **Exhibit A** and (e) schedules deadlines for administration of the settlement and dates for further proceedings in this matter that are consistent with the deadlines and dates set forth in the Agreement.

Defendant's counsel has informed Plaintiffs' counsel that Defendant does not oppose this Motion.

As grounds for this Motion, Plaintiffs respectfully refer the Court to their Memorandum in Support, which has been filed contemporaneously herewith.

Dated: April 6, 2015

Respectfully submitted,

/s/ Jeffrey S. Morneau

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated as non-registered participants on the date of its filing.

/s/ Jeffrey S. Morneau

Jeffrey S. Morneau